

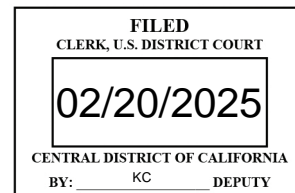
AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original☐ Duplicate Original

## UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

Case No. 5:25-mj-00084

Ramon Rangel-Arellano,

Defendant.

**CRIMINAL COMPLAINT BY TELEPHONE  
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 16, 2024 in the county of San Bernardino County in the Central District of California, the defendant(s) violated:

*Code Section*

8 U.S.C. § § 1326(a)

*Offense Description*

Illegal Alien Found in the United States  
Following Deportation or Removal

This criminal complaint is based on these facts:

*Please see attached affidavit.*

☒ Continued on the attached sheet.

/s/ Jeo Prakash (with consent)

*Complainant's signature*

Jeo Prakash, Special Agent

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date:

February 20, 2025

*Judge's signature*

City and state: Riverside, California

Hon. Sheri Pym, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Jeo Prakash, being duly sworn, declare and state as follows:

**I. PURPOSE OF AFFIDAVIT**

1. This affidavit is made in support of a criminal complaint and arrest warrant against Ramon Rangel-Arellano ("defendant"), charging him with violating Title 8, United States Code, Section 1326(a), Illegal Alien Found in the United States Following Deportation.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show that there is sufficient probable cause for the requested complaint and warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

**II. BACKGROUND OF AFFIANT**

3. I am a Special Agent ("SA") with Homeland Security Investigations ("HSI") under Immigration and Customs Enforcement ("ICE") under Department of Homeland Security ("DHS"), and I have been so employed since January 2024. I am a "federal law enforcement officer" within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(c), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been a

part of a number of investigations and operations directly and indirectly related to immigration and customs crimes in Southern California. I have graduated both the Criminal Investigator and HSI Special Agent Programs at the Federal Law Enforcement Center ("FLETC") in Brunswick, GA. I have received training in numerous criminal investigations, including immigration, customs, and transnational crime. Prior to that, I was a federal officer for United States Capitol Police. I received six months of training at FLETC in Brunswick, Georgia and Cheltenham, Maryland. Before that, I earned a master's degree in criminal justice from the University of Cincinnati and bachelor's degrees in political science and criminology with a minor in communications from the University of Florida.

### **III. STATEMENT OF PROBABLE CAUSE**

4. On or about January 16, 2024, defendant was arrested and fingerprinted by the Rialto Police Department, in San Bernardino County, California, which led to a match in an FBI database. On January 17, 2024, Pacific Enforcement Response Center ("PERC") was notified, based on defendant's fingerprints, that defendant was present in the United States. Based on my training and experience, I know that PERC receives electronic notifications based on biometric fingerprint data when the fingerprints from the subject in local custody match the fingerprints contained in the DHS and/or ICE law enforcement files maintained for that same subject. As such, I believe that defendant is the subject of the A-File discussed in more detail below.

5. On or about February 14, 2025, I reviewed DHS and ICE law enforcement databases on defendant. Records checks revealed that defendant is a citizen of Mexico and is a previously deported alien with a criminal history. Based on my training and experience, I know that DHS and ICE databases track and document each time an alien is deported or excluded from the United States by ICE, was deported or excluded by the former Immigration and Naturalization Service, or is granted permission to enter or re-enter the United States. DHS and ICE databases confirmed that defendant had been removed, deported, and/or excluded on the following dates: July 19, 2002, October 7, 2007, October 3, 2013, and October 5, 2019. The DHS and ICE databases further indicated that defendant had not applied for, or obtained from the Attorney General or the Secretary of Homeland Security, permission to re-enter the United States.

6. I have also reviewed the defendant's criminal history, which indicated that defendant was previously convicted of Possession of Controlled Substance for Sale, in violation of California Health and Safety Code Section 11378.

7. I determined that this was the defendant's criminal record based on defendant's fingerprint identification number associated with this criminal history.

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**IV. CONCLUSION**

8. For all the reasons described above, there is probable cause to believe that defendant has committed a violation of Title 8, United States Code, Section 1326(a), Illegal Alien Found in the United States Following Deportation.

Attested to by the applicant in  
accordance with the requirements  
of Fed. R. Crim. P. 4.1 by  
telephone on this 20th day of  
February 2025.



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HON. SHERI PYM  
UNITED STATES MAGISTRATE JUDGE